

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: National Prescription Opiate Litigation	Case No. 1:17-md-2804
This Document Relates to: <i>All Third Party Payor Actions</i>	MDL Docket No. 2804 Judge Dan Aaron Polster

**UNITED HEALTHCARE SERVICES, INC.’S MOTION FOR LEAVE TO FILE A REPLY
MEMORANDUM TO THIRD PARTY PAYOR PLAINTIFFS’ AND SETTLING
DISTRIBUTORS’ RESPONSES TO UNITED HEALTHCARE SERVICES, INC.’S
OBJECTION**

Objector United HealthCare Services, Inc. (“United”), by and through its undersigned counsel, hereby moves for leave to file the attached Reply Memorandum to Third Party Payor Plaintiffs’ Response to United’s Objection.

Third Party Payor Plaintiffs filed a Motion for Final Approval of Class Action Settlement and for Attorneys’ Fees, Expenses, and Service Awards on October 18, 2024; United submitted its Objection on November 11, 2024; Third Party Payor Plaintiffs filed a Reply on December 9, 2024; Settling Distributors filed a Response on December 9, 2024. In the Memoranda in support of their Reply/Response, Third Party Payors and Settling Distributors raised several issues for the first time, relying on confidential mediation communications exchanged between Third Party Payors and Settling Distributors and a Declaration of William B. Rubenstein not previously discussed in the Motion.

United seeks a fair opportunity to respond to the new arguments raised by Third Party Payors and Settling Distributors in advance of the Fairness Hearing scheduled for January 13, 2025. Accordingly, United requests that the Court accept a brief Reply Memorandum for this purpose.

A proposed form of order accompanies this motion.

Dated: January 10, 2025

Respectfully submitted,

/s/ Thomas C. Mahlum

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2025, a copy of the foregoing was served on all counsel of record by filing the same with the Court's CM/ECF System.

/s/ Thomas C. Mahlum

Thomas C. Mahlum